

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and)	Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated,)	
)	
<i>Plaintiff,</i>)	
)	<u>CLASS ACTION</u>
vs.)	
)	Honorable Aleta A. Trauger
CORRECTIONS CORPORATION OF)	
AMERICA., <i>et al.</i> ,)	Magistrate Judge Jeffrey S. Frensley
)	
<i>Defendants.</i>)	

**DECLARATION OF ERIC C. PETTIS IN SUPPORT OF DEFENDANTS' OPPOSITION
TO PLAINTIFF'S MOTION TO EXCLUDE OPINION TESTIMONY OF
DEFENDANTS' NON-RETAINED EXPERTS WILLIAM DALIUS, HARLEY LAPPIN,
DON MURRAY, AND KIM WHITE**

I, Eric C. Pettis, declare as follows:

1. I am over 18 years of age and am competent to testify as to the matters stated in this Declaration. I am an associate at the law firm of Latham & Watkins LLP, one of the law firms representing Defendants CoreCivic, Inc. (“CoreCivic”), Damon T. Hininger, David M. Garfinkle, Todd J. Mullenger, and Harley G. Lappin (collectively, “Defendants”).

2. A true and correct copy of Defendants’ Initial Disclosures Pursuant to Rule 26(a)(1)(A) as served on February 23, 2018 is attached as **Exhibit 1**.

3. A true and correct copy of Plaintiff’s Initial Disclosures Pursuant to Rule 26(a)(1) as served on February 23, 2018 is attached as **Exhibit 2**.

4. A true and correct copy of Defendants’ Supplemental Initial Disclosures Pursuant to Rule 26(a)(1)(A) as served on January 3, 2020 is attached as **Exhibit 3**.

5. A true and correct copy of Plaintiff’s Supplemental Initial Disclosures Pursuant to Rule 26(e) as served on March 11, 2020 is attached as **Exhibit 4**.

6. A true and correct copy of excerpts of the July 28, 2020 deposition transcript of Harley Lappin is attached as **Exhibit 5**.

7. A true and correct copy of excerpts of the October 29, 2020 deposition transcript of Harley Lappin is attached as **Exhibit 6**.

8. A true and correct copy of excerpts of the February 26, 2020 deposition transcript of William Dalius is attached as **Exhibit 7**.

9. A true and correct copy of excerpts of the October 28, 2020 deposition transcript of William Dalius is attached as **Exhibit 8**.

10. A true and correct copy of excerpts of the October 23, 2020 deposition transcript of Donald Murray is attached as **Exhibit 9**.

11. A true and correct copy of excerpts of the November 15, 2019 deposition transcript of Kimberly White is attached as **Exhibit 10**.

12. A true and correct copy of excerpts of the October 30, 2020 deposition transcript of Kimberly White is attached as **Exhibit 11**.

13. A true and correct copy of excerpts of the October 15, 2020 deposition transcript of Scott Dodrill is attached as **Exhibit 12**.

14. A true and correct copy of excerpts of the October 27, 2020 deposition transcript of Donna Mellendick is attached as **Exhibit 13**.

15. A true and correct copy of the September 14, 2020 letter from Eric C. Pettis to Christopher M. Wood is attached as **Exhibit 14**.

16. Pursuant to 28 U.S.C. §1746, I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

Executed on January 22, 2021 in Los Angeles, California.



Eric C. Pettis